

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DECLARATION OF BENJAMIN
W. HULSE IN SUPPORT OF 3M
COMPANY'S MOTION
TO REMOVE "CONFIDENTIAL"
DESIGNATION FROM
DOCUMENTS PRODUCED BY
RIDGEVIEW MEDICAL CENTER**

(FILED UNDER SEAL)

Benjamin W. Hulse, being first duly sworn, deposes and declares:

1. I am one of the attorneys representing Defendant 3M Company in connection with the above-referenced matter. I make this declaration in support of 3M Company's Motion to Remove "Confidential" Designation From Documents Produced by Ridgeview Medical Center.

2. Attached hereto as Exhibit A is a summary chart that describes the documents at issue in 3M's motion.

3. Attached hereto as Exhibit B is a copy of [REDACTED]
[REDACTED], which was produced to 3M
in discovery [REDACTED].

4. Attached hereto as Exhibit C is a copy of a document entitled [REDACTED]
[REDACTED]
[REDACTED] which was produced to 3M in discovery.

5. Attached hereto as Exhibit D is a copy of certain documents produced to 3M by Ridgeview Medical Center, described more fully on the chart attached hereto as Exhibit A, [REDACTED].

6. Attached hereto as Exhibit E is a copy of a document produced to 3M by Ridgeview Medical Center, described more fully on the chart attached hereto as Exhibit A, [REDACTED].

7. Attached hereto as Exhibit F is a copy of pages 311-312 from the transcript of the Deposition of Dr. Scott Augustine.

8. Attached hereto as Exhibit G is a copy of pages 320-322 from the transcript of the Deposition of Dr. Scott Augustine.

9. Attached hereto as Exhibit H is a copy of a Star Tribune article entitled "This medical device rivalry is getting a bit heated," dated December 3, 2011.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of May, 2017.

/s/ Benjamin W. Hulse
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